

1 Kevin S. Asfour (SBN 228993)
kevin.asfour@klgates.com
2 K&L GATES LLP
10100 Santa Monica Blvd., 8th Floor
3 Los Angeles, California 90067
Telephone: (310) 552-5000
4 Facsimile: (310) 552-5001

5 Attorney for Defendants
Amazon.com Services LLC
6 and Amazon.com, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 || JOSEPHINE VILLASENOR.

12 Plaintiff,

13 || v.

14 | AMAZON.COM SERVICES LLC;
15 | AMAZON.COM, INC.;
DOES 1-10

16 Defendants.

Case No. 2:25-cv-01466-SB-JPR

**STIPULATION TO REMAND CASE
TO STATE COURT**

Complaint served: Jan. 21, 2025
Action removed: Feb. 20, 2025
Old response date: Feb. 27, 2025
New response date: Mar. 28, 2025

Assigned to Hon. Stanley Blumenfeld, Jr.

1 **TO THE HONORABLE COURT:**
2

3 Plaintiff Josephine Villasenor, on the one hand, and Defendants Amazon.com
4 Services LLC and Amazon.com, Inc. (“Defendants”), on the other hand, by and
5 through their undersigned counsel, hereby stipulate to remand this action to the Los
6 Angeles County Superior Court with reference to the following:
7

8 WHEREAS the summons and complaint in this action were served upon
9 Defendants on January 21, 2025;
10

11 WHEREAS Defendants removed this action to this Court on February 20,
12 2025 on the basis of both federal question jurisdiction and diversity jurisdiction;
13

14 WHEREAS on February 20, 2025, the parties met and conferred regarding,
15 *inter alia*, a contemplated motion to dismiss by Defendants;
16

17 WHEREAS during the course of the parties’ February 20, 2025 discussion,
18 Plaintiff’s counsel indicated that he would ultimately seek remand of this action to
19 state court by way of withdrawing the sole federal claim in the complaint and
20 joining an additional individual defendant, whose identity is presently unknown but
21 who is presumed to be a California citizen, thereby defeating diversity jurisdiction;
22

23 WHEREAS in light of the foregoing and the likelihood that Plaintiff’s
24 intended course of action will ultimately lead to a remand of this action to state
25 court, the parties have agreed to stipulate to such remand forthwith, in an effort to
26 streamline this litigation;
27

28 ///
29
30 ///
31
32 ///
33
34 ///
35
36 ///
37
38 ///
39
40

NOW, THEREFORE, the parties stipulate and agree that the Court should **REMAND** this action forthwith to the Los Angeles County Superior Court in which it was originally filed, and respectfully request that the Court enter the accompanying Proposed Order to that effect.

K&L GATES LLP

Dated: February 26, 2025

By: /s/ Kevin S. Asfour
Kevin S. Asfour
*Attorneys for Defendants Amazon.com
Services LLC and Amazon.com, Inc.*

MURRIN LAW FIRM

Dated: February 26, 2025

By: /s/ J. Owen Murrin
J. Owen Murrin
*Attorneys for Plaintiff Josephine
Villasenor*

SIGNATURE ATTESTATION

Pursuant L.R. 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed concur in this document's content and have authorized the execution of this document with the use of their electronic signature.

Dated: February 26, 2025

By: /s/ Kevin S. Asfour
Kevin S. Asfour

Attorneys for Defendants Amazon.com Services LLC and Amazon.com, Inc.